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10	UNITED STATES DISTRICT COURT	
11	EASTERN DISTRIC	CT OF CALIFORNIA
12		
13	CONSUELO MILEN HUERTA,) Case No.: 2:25-cv-01486-AC
14	Plaintiff,)) STIPULATION AND [PROPOSED] ORDER) FOR AN EXTENSION OF TIME
15) FOR AN EXTENSION OF TIME)
	Vs.	
16	Commissioner of Social Security,	
17	Defendant.))
18))
19	Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the	
20	parties, through their respective counsel of record, that the time for Defendant to respond to	
21	Plaintiff's Motion for Summary Judgment be extended thirty (30) days from September 5, 2025,	
22	up to and including October 6, 2025. This is Defendant's first request for an extension.	
23	Defendant requests this extension in ord	er to further consider the administrative record in
24	light of the issues raised in Plaintiff's motion. The undersigned has a number of competing	
25	deadlines in cases pending in this district and of	ther districts.
26	The parties further stipulate that the Cou	art's Scheduling Order shall be modified
27	accordingly.	
28		

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1		Respectfully submitted,
2	Dated: August 27, 2025	/s/ Paul Sachelari*
3 4		(*as authorized via e-mail on August 27, 2025) PAUL SACHELARI Attorney for Plaintiff
5	D . 1 . 4	·
6	Dated: August 27, 2025	ERIC GRANT United States Attorney
7		MATHEW W. PILE Associate General Counsel
8		Social Security Administration
9	By:	/s/ Erin Jurrens
10		ERIN JURRENS Special Assistant U.S. Attorney
11		Attorneys for Defendant
12		
13		<u>ORDER</u>
14	Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an	
15	extension, up to and including October 6, 2	2025, to respond to Plaintiff's Motion for Summary
16	Judgment.	
10		
17		
	DATED: August 27, 2025	auran Clane
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